

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

IN RE:

CASE NO. 19-24263

Amy N. Uebelacker,

CHAPTER 13

DEBTOR.

Judge Beth E. Hanan

**STIPULATION FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT IN
REGARD TO MOTION FOR RELIEF FROM AUTOMATIC STAY AND
ABANDONMENT AS TO PROPERTY LOCATED AT 8870 NORTH GREEN BROOK
COURT, BROWN DEER, WISCONSIN 53223**

NOW COMES Wilmington Savings Fund Society, FSB, D/B/A Christiana Trust as Owner Trustee of the Residential Credit Opportunities Trust III ("Movant"), Amy N. Uebelacker ("Debtor"), and Chapter 13 Trustee Rebecca R. Garcia, who hereby stipulate and agree as follows:

1. The Debtor failed to make certain of the regular monthly payments to Movant; said post-petition payments are currently in default for September 01, 2019 and October 1, 2019 in the amount of \$1,958.40, plus late charges in the amount of \$41.82 and Attorney fees in the amount of \$1,030.00.
2. In order to eliminate said post-petition delinquency, the Debtor and Movant agree that the Amended Chapter 13 Plan will be modified so that the arrearage in the amount of \$3,030.22 shall be paid through the Plan.
3. Movant shall file a Supplemental Proof of Claim in the amount of \$3,030.22.
4. Debtor shall file an Amended Plan with 30 days of the entry of the Stipulation to provide for the payment of the aforementioned post-petition arrearages through the plan. In

addition, the Debtor shall resume regular monthly payments in the amount of \$979.20 each.

The next monthly payment will be due November 1, 2019.

5. In the event that said Debtor should fail to amend the plan within 30 days, or fail to make any regular post-petition payment on the date that it is contractually due, then, Movant shall give ten (10) days' notice to Debtor's counsel and to the Debtor; and thereafter Movant shall file with the Court an affidavit certifying that the Debtor is in default under the terms of the Stipulation and upon submission of such affidavit, the Court shall enter an order, without hearing, providing Movant with relief from stay and abandonment . This stipulation will expire in six months from the date of entry.

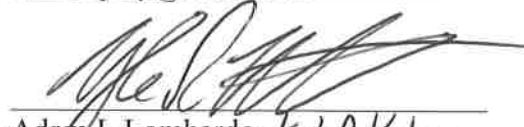
DATED: September 14, 2018

/s/ Jon Lieberman

Jon Lieberman (OH 0058394)
Sottile & Barile, Attorneys at Law
394 Wards Corner Road, Suite 180
Loveland, OH 45140
Phone: (513) 444.4100
bankruptcy@sottileandbarile.com

DATED:

10-10-19


Adam L. Lombardo *Kyle R. Knutson*
Lombardo Law Office
10919 West Bluemound Road, Suite 200
Milwaukee, WI 53226
Phone: 414-543-3328
Fax: 414-543-0786
Email: adam@lombardolawoffice.com
Attorney for Debtor

DATED:

10/14/2019

Rebecca R. Garcia
Chapter 13 Trustee
PO Box 3170

Oshkosh, WI 54903-3170
920-231-2150
Fax: 920-231-5713
Email: filings@ch13oshkosh.com
Chapter 13 Trustee